

REMARKS

Claims 1-6, 12-15 and 17-35 are pending with claims 1-4, 17 and 18 being independent. Claims 1-4, 17 and 18 have been amended. No new matter has been introduced.

Claims 1-6, 12-15 and 17-28 have been rejected for obviousness-type double patenting as being unpatentable over claims 1-22 of copending application serial No. 10/662,357 in view of Pichler (U.S. 2004/0187917). Applicant requests that this provisional rejection be held in abeyance until the claims of the present application and those of the '357 application are otherwise found to be allowable.

Claims 1 and 5 have been rejected as being anticipated by Pichler. Applicant requests reconsideration and withdrawal of this rejection because Pichler does not describe or suggest an arrangement in which a film containing fluoroplastics is formed over a second electrode that is over a first electrode, and an inorganic insulating film is formed over the film containing fluoroplastics. The rejection asserts that Pichler discloses an encapsulant 512 containing fluoroplastics that is formed over a second electrode 502 and on which an inorganic insulating film of silicon oxide or silicon nitride is formed.

Applicant respectfully disagrees, and notes that Pichler does not disclose or suggest forming an organic insulating film over the encapsulant 512, and also does not describe or suggest having the encapsulant 512 comprise fluoroplastics. Rather, paragraph 108 of Pichler, which the rejection relies upon as showing the film containing fluoroplastics, merely states that, for the purpose of improving moisture resistance and scratch resistance, "a fluorine resin may [be] laminated [on] the encapsulant layers 510, 512 as a surface protecting layer." While this passage is grammatically incorrect, it is best understood to mean that the fluorine resin may be applied to the surface of the encapsulant 512. As such, Pichler provides no description or suggestion of including fluoroplastics in the encapsulant 512, or of forming an inorganic insulating film 512 over the fluorine resin. Indeed, since one of the main purposes of using the fluorine resin is to improve scratch resistance, it would be contrary to the teachings of Pichler to form an inorganic insulating film over the fluorine resin, since doing so would eliminate that benefit of the fluorine resin.

Claims 2, 12, 24 and 30 have been rejected as being obvious over Yasukawa (U.S. Patent No. 6,583,440) in view of Pichler. Applicant requests reconsideration and withdrawal of this rejection because neither Yasukawa, Pichler, nor any proper combination of the two describes or suggests an arrangement in which a film containing fluoroplastics is formed over a second electrode that is over a first electrode over a TFT, an inorganic insulating film is formed over the film containing fluoroplastics, and an electroluminescent film is disposed between the first and second electrodes.

The rejection asserts that the common electrode 21 of Yasukawa corresponds to the recited second electrode, that the alignment film 22 corresponds to the recited film containing fluoroplastics, that the substrate main body 20A corresponds to the recited inorganic insulating film, and that the liquid crystal layer 50 corresponds to the recited electroluminescent film. Recognizing that Yasukawa does not describe including fluorocarbons in the alignment film 22, the rejection turns to Pichler and indicates that Pichler's description of using fluorine resin, as discussed above, would have led one of ordinary skill in the art to include fluoroplastics in Yasukawa's alignment film 22.

This analysis is flawed for a number of reasons. First, since the common electrode 21 is located between the substrate main body 20A and the alignment film 22, these elements cannot be said to correspond to the recited arrangement of an inorganic insulating film over a film containing fluoroplastics over a second electrode. Second, the substrate main body 20A is in no way an insulating film. Third, the liquid crystal layer 50 cannot be said to be an electroluminescent film. Finally, nothing in Yasukawa or Pichler would have led one of ordinary skill in the art to include Pichler's fluorine resin in Yasukawa's alignment film 22. While the rejection asserts that this motivation would have come from Pichler's description of the scratch and moisture resistant properties of the fluorine resin, this would not have been the case since the alignment film 22 is an interior layer that would not have benefited from those properties, and is protected by the much more robust substrate main body 20A.

Accordingly, for at least these reasons, the rejection should be withdrawn.

Claims 3, 4, 6, 17-22, 25-28, 31, 32, 34 and 35 have been rejected as being unpatentable over Yasukawa in view of Pichler and Seo (U.S. Patent No. 6,642,207).

Each of claims 3 and 4, like claim 2, recites an arrangement in which a film containing fluoroplastics is formed over a second electrode that is over a first electrode over a TFT, an inorganic insulating film is formed over the film containing fluoroplastics, and an electroluminescent film is disposed between the first and second electrodes. Accordingly, with respect to claims 3 and 4, and their dependent claims, applicant requests reconsideration and withdrawal of this rejection for the reasons discussed above with respect to claim 2, and because Seo, which is cited as showing an interlayer dielectric layer 60 consisting of silicon oxide, polyimide, or Teflon, does not remedy the failure of Yasukawa and Pichler to describe or suggest this aspect of the claims.

Each of claims 17 and 18 recites an arrangement in which an insulating film containing fluoroplastics is formed between a TFT and a first of two electrodes between which an electroluminescent film is disposed. As noted in the application at page 18, lines 1-5, such an arrangement may be beneficial in that the film containing fluoroplastics can serve as a protective film for protecting a light-emitting device against moisture or oxygen before forming a wiring and a first electrode for the light-emitting device.

With respect to claims 17 and 18, and their dependent claims, applicant requests reconsideration and withdrawal of this rejection because neither Yasukawa, Pichler, Seo, nor any proper combination of the three describes or suggests an arrangement in which an insulating film containing fluoroplastics is formed between a TFT and a first of two electrodes between which an electroluminescent film is disposed. As best understood, the rejection appears to assert that one of ordinary skill in the art would have been motivated to replace Yasukawa's interlayer insulating film 4 or 7 with Seo's dielectric layer 60, because such a replacement would have been considered a mere substitution of equivalent values.

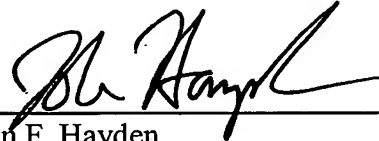
Applicant respectfully disagrees. Seo describes an arrangement in which an interlayer dielectric layer, which may be made from, for example, Teflon, is used to fill gaps between adjacent gates in a non-volatile memory device. Nothing in Seo, Yasukawa or Pichler would have led one of ordinary skill in the art to believe that such an interlayer dielectric layer could be readily substituted for a film covering a TFT, such as the interlayer insulating film 4 or 7 of Yasukawa. Accordingly, for at least this reason, the rejection should be withdrawn.

Applicant : Toru Takayama et al.
Serial No. : 10/662,508
Filed : September 16, 2003
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Attorney's Docket No.: 12732-166001 / US6611

Please apply the request for continued examination fee (\$790) and the one-month extension of time fee (\$120) to Deposit Account No. 06-1050. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,



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Date: October 27, 2005

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